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UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY IN SUPPORT OF
DEFENDANTS' MOTION TO ENFORCE THE
MARCH 26, 2025 ORDER (ECF NO. 2826)**

This Document Relates to:

*Jane Doe LS 293 v. Uber Technologies,
Inc., et al.*, No. 3:23-cv-04364-CRB

*Jane Doe LS 231 v. Uber Technologies,
Inc., et al.*, No. 3:23-cv-04367-CRB

*Jane Doe LS 144 v. Uber Technologies,
Inc., et al.*, No. 3:23-cv-04388-CRB

*Jane Doe LS 112 v. Uber Technologies,
Inc., et al.*, No. 3:23-cv-05286-CRB

*Jane Doe LS 284 v. Uber Technologies,
Inc., et al.*, No. 3:23-cv-05363-CRB

*Jane Doe LS 126 v. Uber Technologies,
Inc., et al.*, No. 3:23-cv-05370-CRB

*Jane Doe LS 265 v. Uber Technologies,
Inc., et al.*, No. 3:23-cv-05377-CRB

Judge: Hon. Charles R. Breyer
Date: July 11, 2025
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

1 *Jane Doe LS 200 v. Uber Technologies,*
2 *Inc., et al., No. 3:23-cv-05387-CRB*

3 *Jane Doe LS 66 v. Uber Technologies,*
4 *Inc., et al., No. 3:23-cv-05414-CRB*

5 *Jane Doe LS 317 v. Uber Technologies,*
6 *Inc., et al., No. 3:23-cv-05424-CRB*

7 *Jane Doe LS 234 v. Uber Technologies,*
8 *Inc., et al., No. 3:23-cv-05433-CRB*

9 *Jane Doe LS 191 v. Uber Technologies,*
10 *Inc., et al., No. 3:23-cv-05573-CRB*

11 *Jane Doe LS 273 v. Uber Technologies,*
12 *Inc., et al., No. 3:23-cv-05946-CRB*

13 *Jane Doe LS 470 v. Uber Technologies,*
14 *Inc., et al., No. 3:24-cv-05207-CRB*

15 *Jane Doe LS 232 v. Uber Technologies,*
16 *Inc., et al., No. 3:24-cv-05327-CRB*

17 *Jane Doe LS 373 v. Uber Technologies,*
18 *Inc., et al., No. 3:24-cv-05328-CRB*

19 *Jane Doe LS 462 v. Uber Technologies,*
20 *Inc., et al., No. 3:24-cv-05329-CRB*

21 *Jane Doe LS 226 v. Uber Technologies,*
22 *Inc., et al., No. 3:24-cv-05330-CRB*

23 *Jane Doe LS 166 v. Uber Technologies,*
24 *Inc., et al., No. 3:24-cv-05331-CRB*

25 *Jane Doe LS 122 v. Uber Technologies,*
26 *Inc., et al., No. 3:24-cv-05332-CRB*

27 *Jane Doe LS 202 v. Uber Technologies,*
28 *Inc., et al., No. 3:24-cv-05333-CRB*

Jane Doe LS 416 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05335-CRB

Jane Doe LS 305 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05338-CRB

Jane Doe LS 201 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05354-CRB

Jane Doe LS 189 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05379-CRB

Jane Doe LS 272 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05390-CRB

Jane Doe LS 199 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05402-CRB

Jane Doe LS 279 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05420-CRB

Jane Doe LS 139 v. Uber Technologies, Inc., et al., No. 3:24-cv-05527-CRB

Jane Doe LS 487 v. Uber Technologies, Inc., et al., No. 3:24-cv-05611-CRB

Jane Doe LS 141 v. Uber Technologies, Inc., et al., No. 3:24-cv-05634-CRB

Jane Doe LS 423 v. Uber Technologies, Inc., et al., No. 3:24-cv-05676-CRB

Jane Doe LS 491 v. Uber Technologies, Inc., et al., No. 3:24-cv-05678-CRB

Jane Doe LS 441 v. Uber Technologies, Inc., et al., No. 3:24-cv-05751-CRB

Jane Doe LS 518 v. Uber Technologies, Inc., et al., No. 3:24-cv-05761-CRB

Jane Doe LS 319 v. Uber Technologies, Inc., et al., No. 3:24-cv-05800-CRB

Jane Doe LS 484 v. Uber Technologies, Inc., et al., No. 3:24-cv-05824-CRB

Jane Doe LS 4 v. Uber Technologies, Inc., et al., No. 3:24-cv-05861-CRB

Jane Doe LS 368 v. Uber Technologies, Inc., et al., No. 3:24-cv-05898-CRB

Jane Doe LS 274 v. Uber Technologies, Inc., et al., No. 3:24-cv-05902-CRB

Jane Doe LS 359 v. Uber Technologies, Inc., et al., No. 3:24-cv-05908-CRB

Jane Doe LS 342 v. Uber Technologies, Inc., et al., No. 3:24-cv-05913-CRB

Jane Doe LS 304 v. Uber Technologies, Inc., et al., No. 3:24-cv-05914-CRB

Jane Doe LS 369 v. Uber Technologies, Inc., et al., No. 3:24-cv-05915-CRB

Jane Doe LS 269 v. Uber Technologies, Inc., et al., No. 3:24-cv-05922-CRB

Jane Doe LS 93 v. Uber Technologies, Inc., et al., No. 3:24-cv-05925-CRB

Jane Doe LS 7 v. Uber Technologies, Inc., et al., No. 3:24-cv-05926-CRB

Jane Doe LS 504 v. Uber Technologies, Inc., et al., No. 3:24-cv-05928-CRB

Jane Doe LS 180 v. Uber Technologies, Inc., et al., No. 3:24-cv-05936-CRB

Jane Doe LS 119 v. Uber Technologies, Inc., et al., No. 3:24-cv-05937-CRB

Jane Doe LS 197 v. Uber Technologies, Inc., et al., No. 3:24-cv-06003-CRB

Jane Doe LS 314 v. Uber Technologies, Inc., et al., No. 3:24-cv-06016-CRB

Jane Doe LS 188 v. Uber Technologies, Inc., et al., No. 3:24-cv-06022-CRB

Jane Doe LS 230 v. Uber Technologies, Inc., et al., No. 3:24-cv-06026-CRB

Jane Doe LS 209 v. Uber Technologies, Inc., et al., No. 3:24-cv-06033-CRB

Jane Doe LS 532 v. Uber Technologies, Inc., et al., No. 3:24-cv-06927-CRB

Jane Doe LS 534 v. Uber Technologies, Inc., et al., No. 3:24-cv-07142-CRB

DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Uber’s”) Motion to Enforce the March 26, 2025 Order (ECF No. 2826) which requests that the cases of certain Plaintiffs represented by Levin Simes LLP (“Levin Simes”) be dismissed without prejudice for noncompliance with discovery orders.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of California, the Bar of the District of Columbia Court of Appeals and the Bar of the State of New York. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. Attached to this declaration as **Exhibit A** is a table identifying 47 Plaintiffs represented by Levin Simes who, as of the date of this submission, have failed to submit a Plaintiff Fact Sheet

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2 (“PFS”). The Plaintiffs’ deadlines for providing a PFS are identified in the table at Exhibit A. All 47
3 Plaintiffs were subject to the Court’s March 26, 2025 Order (ECF No. 2826) which extended Plaintiffs’
4 deadlines for providing complete and verified Plaintiff Fact Sheets to April 9, 2025.

5 I declare under penalty of perjury under the laws of the United States of America that the
6 foregoing is true and correct.

7 Executed on May 16, 2025 in Columbus, Ohio.

8
9 /s/ Michael B. Shortnacy
10 MICHAEL B. SHORTNACY
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